

FILED

2008 APR 30 PM 3:30

CLERK US DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY *[Signature]* DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

UNITED STATES OF AMERICA, ) Criminal Case No. **'08 CR 1361** **DMS**  
                              )  
Plaintiff,                ) I N D I C T M E N T  
                              )  
v.                         ) Title 8, U.S.C.,  
RICARDO AVALOS-RAMIREZ, ) Secs. 1324(a)(1)(A)(ii) and  
                              ) (v)(II) - Transportation of  
Defendant.                ) Illegal Aliens and Aiding and  
                              ) Abetting; Title 8, U.S.C.,  
                              ) Secs. 1326(a) and (b) - Deported  
                              ) Alien Found in the United States

The grand jury charges:

Count 1

On or about February 18, 2008, within the Southern District of California, defendant RICARDO AVALOS-RAMIREZ, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Arminda Avalos-Ramirez, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

//

//

CEM:fer:San Diego  
4/29/08

CR

1

Count 2

2 On or about February 18, 2008, within the Southern District of  
3 California, defendant RICARDO AVALOS-RAMIREZ, with the intent to  
4 violate the immigration laws of the United States, knowing and in  
5 reckless disregard of the fact that an alien, namely, Yaritza  
6 Gutierrez-Sotelo, had come to, entered and remained in the United  
7 States in violation of law, did transport and move said alien within  
8 the United States in furtherance of such violation of law; in  
9 violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii)  
10 and (v)(II).

11

Count 3

12 On or about February 18, 2008, within the Southern District of  
13 California, defendant RICARDO AVALOS-RAMIREZ, with the intent to  
14 violate the immigration laws of the United States, knowing and in  
15 reckless disregard of the fact that an alien, namely, Ricardo Cruz-  
16 Jimenez, had come to, entered and remained in the United States in  
17 violation of law, did transport and move said alien within the United  
18 States in furtherance of such violation of law; in violation of  
19 Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

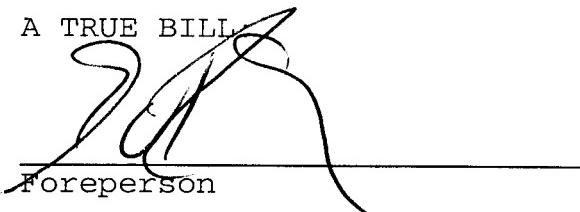
1                   Count 4

2       On or about February 18, 2008, within the Southern District of  
3 California, defendant RICARDO AVALOS-RAMIREZ, an alien, who previously  
4 had been excluded, deported and removed from the United States to  
5 Mexico, was found in the United States, without the Attorney General  
6 of the United States or his designated successor, the Secretary of the  
7 Department of Homeland Security (Title 6, United States Code,  
8 Sections 202(3) and (4), and 557), having expressly consented to the  
9 defendant's reapplication for admission into the United States; in  
10 violation of Title 8, United States Code, Sections 1326(a) and (b).

11       It is further alleged that defendant RICARDO AVALOS-RAMIREZ, was  
12 removed from the United States subsequent to March 13, 1994.

13       DATED: April 30, 2008.

14                   A TRUE BILL,

15                     
16                   \_\_\_\_\_  
17                   Foreperson

18       KAREN P. HETWITT  
United States Attorney

19         
20       By: CALEB E. MASON  
21                   Assistant U.S. Attorney

22

23

24

25

26

27

28